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Attorneys for Defendants  
 ETHICON, INC. (on its own behalf and behalf of its  
 Division, ETHICON WOMEN'S HEALTH &  
 UROLOGY, and erroneously sued as GYNECARE,  
 INC.); and JOHNSON & JOHNSON

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

GINA LAFORGE, an individual,  
  
 Plaintiff,  
  
 v.

GYNECARE, INC., a California  
 corporation; ETHICON, INC., a New  
 Jersey corporation; JOHNSON &  
 JOHNSON, a New Jersey corporation; and  
 DOE MANUFACTURES ONE through  
 ONE HUNDRED,  
  
 Defendants.

Case No. 4:11-CV-00698-CW

**STIPULATION AND JOINT REQUEST  
 FOR RELIEF FROM CASE  
 MANAGEMENT SCHEDULE AND  
 ORDER**

Date: July 26, 2011  
 Time: 2:00 p.m.  
 Courtroom: 2  
 Judge: Hon. Claudia Wilken

Complaint Filed: October 20, 2010  
**Trial Date:** Not set

Pursuant to Local Rule 16-2(e) of the United States District Court of the Northern District  
 of California, the parties request a continuance of the Case Management Conference as follows:

1. On February 15, 2011, the Court scheduled a Case Management Conference for  
 July 26, 2011.
2. Due to the parties considering a proposal put forward by Plaintiff for the potential  
 dismissal of this lawsuit, all parties request that the Case Management Conference be continued

60 days.

WHEREFORE Plaintiffs and Defendants, hereby stipulate by the undersigned counsel to request that the Court continue the Case Management Conference currently set for July 26, 2011 for an additional 60 days or to a date convenient to the Court.

Dated: July 13, 2011

DRINKER BIDDLE & REATH LLP

By: /s/ Michelle A. Childers

Michelle A. Childers

Attorneys for Defendants  
ETHICON, INC. (on its own behalf and behalf  
of its Division, ETHICON WOMEN'S  
HEALTH & UROLOGY, and erroneously  
sued as GYNECARE, INC.); and JOHNSON  
& JOHNSON

Dated: July 13, 2011

GIRARDI & KEESE

By: /s/ Amanda Kent

Amanda Kent  
Thomas V. Girardi  
Amy Fisch Solomon  
Amanda Kent

Attorneys for Plaintiffs

The Case Management Conference scheduled for July 26, 2011 is hereby continued until **September 20**, 2011.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: **7/18/2011**

BY THE COURT

By:   
Honorable Claudia Wilken  
United States District Judge